

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America )

v. )

MARK VEGA )

Case No. 16- 1157-M )

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 7, 2015 to July 11, 2016 in the county of Berks in the  
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 1341

mail fraud

18 U.S.C. 1028A

aggravated identity theft

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complainant's signature

Postal Inspector Scott Guretske

Printed name and title

Sworn to before me and signed in my presence.

Date:

9/14/2016

Judge's signature

City and state:

Philadelphia, PA

Honorable Linda K. Caracappa, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT OF POSTAL INSPECTOR SCOTT GURETSE  
IN SUPPORT OF ARREST**

I, Scott Guretse, being duly sworn, hereby state and declare as follows:

1. I am a United States Postal Inspector employed by the United States Postal Inspection Service ("USPIS"). I have been a Postal Inspector since September 2005. I am assigned to a USPIS multifunctional team in Valley Forge, Pennsylvania. During this time, I have been involved in numerous arrests and search warrants. Currently, I primarily investigate mail theft, identity theft, mail fraud, drug trafficking through the U.S. Mail, and related crimes.

2. I am currently a case agent in a multi-agency investigation which is investigating groups of individuals using lists of names and social security numbers for fraudulent purposes. I believe Mark Vega is participating in a mail fraud scheme, and has violated Title 18, United States Code, Section 1341, and Title 18, United States Code, Section 1028A, aggravated identity theft. The factual allegations set forth herein are based on my personal observations and knowledge, in addition to information obtained from other federal and local law enforcement agencies, public records, bank records, and other involved parties and sources as indicated. The facts contained in this affidavit are not all those known to me, simply those necessary to establish probable cause. The purpose of this Affidavit is to set forth sufficient facts to justify the issuance of a complaint and warrant.

3. On July 19, 2016, a fraud investigator with Discover Financial Services reported to Cumru Township Police Department that a credit card account was fraudulently opened through Discover using the stolen identity of victim C.L., who is a resident of the state of New York. The card was used to make fraudulent purchases totaling \$16,314.13.

4. On August 10, 2016, Detective Christopher Lis with Cumru Township Police Department contacted Discover Financial Services and requested all information associated with the identity theft of C.L.

5. Discover Financial Services advised of four (4) fraudulent attempts to obtain a credit card through Discover utilizing the identity information of C.L. Three (3) were unsuccessful and one (1) was successful as follows:

- a) On 03/26/16, an electronic application for credit was submitted via the internet to Discover utilizing the name, date of birth and social security number of C.L. and was declined. The address listed for C.L. was 503 Marshall Drive, Shillington, PA 19607 which is located in the Eastern District of Pennsylvania, in Berks County, PA and is not the true address for C.L., who, according to public records, resides in the state of New York.
- b) On 04/08/16, an electronic application for credit was submitted via the internet to Discover, utilizing the name, date of birth and social security number of C.L. and was declined. The address listed for C.L. was 503 Marshall Drive, Shillington, PA 19607.
- c) On 04/12/16, an electronic application for credit was submitted via the internet to Discover utilizing the name, date of birth and social security number of C.L. and was declined. The address listed for C.L. was 503 Marshall Drive, Shillington, PA 19607. The phone number listed was (917) 509-3664.
- d) On 05/03/16, an electronic application for credit was submitted via the internet to Discover utilizing the name, date of birth and social security number of C.L. On 05/05/16, the application was approved and resulted in the issuance of Discover Card Number xxxxxxxxxxxx9677 with a credit limit of \$43,800.06. The address listed for C.L. was 503 Marshall Drive, Shillington, PA 19607 and is not the true address for C.L. who resides in the state of New York.

The Discover investigator spoke to C.L., who confirmed that s/he did not submit any of the above-referenced applications.

6. On 5/11/16 a representative with Discover received a phone call from telephone number (917) 688-0129. A male who verbally identified himself as C.L. requested that a credit card be mailed overnight to 503 Marshall Drive, Shillington, PA 19607. The credit card was mailed overnight by Discover to 503 Marshall Drive, Shillington, PA 19607. On 05/12/16, at 1401 hours, the card was delivered to this address. There were one hundred eighty-eight (188) fraudulent transactions completed with Discover Card Number xxxxxxxxxxxx9677 from between 05/12/16 and 07/04/16 totaling \$16,314.13. The transactions included purchases completed at retail locations where items or services were bought, withdrawals at ATM locations where cash was withdrawn and electronic payments made to service providers.

7. Berks County Parcel Records list Ramon Rodriguez and Dominica L. Rosario as the property owners of 503 Marshall Drive, Cumru Township, Berks County, PA.

8. Detective Lis reviewed records held and maintained by Cumru Township Police Department. Detective Lis learned that Mark Vega and others listed an address of 503 Marshall Drive, Reading, PA 19607. There was an entry under Incident #34-15-004523 in which Mark Vega was prosecuted for Theft of Leased Property. On 07/29/2015, in the course of the Theft of Leased Property investigation, an officer from Cumru Township Police contacted Mark Vega at phone number (917) 688-0129, the same number used by the person who requested that the Discover Card be overnighted to 503 Marshall Drive. Mark Vega verified his current address as 503 Marshall Drive, Cumru Township, Berks County.

9. Detective Lis queried JNET records and learned that Mark Vega has a PA Driver's License issued to him under OLN: 32426643. The license was issued on 06/30/16 and listed an address of 503 Marshall Drive, Shillington, PA 19607.

10. Detective Lis queried Mark Vega for prior arrests and learned of the following that occurred in NY and PA:

- Arrested 02/28/07 by NYCPD for Grand Larceny – Credit Card.
- Arrested 07/27/11 by NYCPD for Grand Larceny.
- Arrested 08/07/15 by Cumru Township PD for Theft of Leased Property.

11. Detective Lis traced purchases made with Discover credit card number xxxxxxxxxxxx9677 to several stores and was able to obtain recorded video surveillance footage. Detective Lis compared this footage to a driver's license photo and concluded that Mark Vega was the person who fraudulently made those purchases.

12. On August 10, 2016, Detective Lis disseminated a national alert to law enforcement and financial institutions requesting that he be notified of any credit card accounts associated with fraud and/or identity theft that were delivered to 503 Marshall Drive, Reading, PA 19607 and/or 503 Marshall Drive, Shillington, PA 19607. Detective Lis received several responses from financial institutions and law enforcement agencies. One of the responses was from a fraud investigator at American Express who advised of several fraudulent credit card accounts involving identity theft that are associated with 503 Marshall Drive, Reading/Shillington, PA 19607 and Mark Vega.

13. On August 16, 2016, Detective Lis received a response from the fraud investigator with American Express who advised of the following fraudulent accounts associated

with 503 Marshall Drive, Shillington, PA 19607 (Cumru Township, Berks County, PA) and Mark Vega for which credit cards were issued.

- a. On 08/17/15, an electronic application for credit was submitted via the internet to American Express utilizing the name, date of birth and social security number of H.T. The application was approved and resulted in the issuance of American Express Card Number xxxxxxxx31001. The address listed for H.T. was 503 Marshall Drive, Shillington, PA 19607 and is not the true address for H.T. who resides in the state of New York. A Mark Vega was added to the account as an authorized user which resulted in the issuance of American Express Card Number xxxxxxxx31019, which was mailed to 503 Marshall Drive Shillington, PA 19607.
- b. On 01/05/16, an electronic application for credit was submitted via the internet to American Express utilizing the name, date of birth and social security number of P.T. The application was approved and resulted in the issuance of American Express Card Number xxxxxxxx61009. The address listed for P.T. was 503 Marshall Drive, Shillington, PA 19607 and is not the true address for P.T., who resides in the state of New York. A Mark Vega was added to the account as an authorized user which resulted in the issuance of American Express Card Number xxxxxxxx361017 which was mailed to 503 Marshall Drive Shillington, PA 19607.
- c. On 03/08/16, an electronic application for credit was submitted via the internet to American Express utilizing the name, date of birth and social security number of C.L. The application was approved and resulted in the issuance of American Express Card Number xxxxxxxxxxxx1000. The address listed for C.L. was 503 Marshall Drive, Shillington, PA 19607 and is not the true address for C.L., who resides in the state of New York. A Mark Vega was added to the account as an authorized user which resulted in the issuance of American Express Card Number xxxxxxxxxxxx1018 which was mailed to 503 Marshall Drive Shillington, PA 19607. As noted above in paragraph 5 and

6, four attempts were initiated to obtain a credit card from Discover Financial Services using C.L. information.

- d. On 04/04/16, an electronic application for credit was submitted via the internet to American Express utilizing the name, date of birth and social security number of S.P. The application was approved and resulted in the issuance of American Express Card Number xxxxxxxxx01003. The address listed for S.P. was 503 Marshall Drive, Shillington, PA 19607 and is not the true address for S.P., who resides in the state of New York. A Mark Vega was added to the account as an authorized user which resulted in the issuance of American Express Card Number xxxxxxxxx01011 which was mailed to 503 Marshall Drive Shillington, PA 19607.
- e. On 07/05/16, an electronic application for credit was submitted via the internet to American Express utilizing the name, date of birth and social security number of K.Y. The application was approved and resulted in the issuance of American Express Card Number xxxxxxxxx71006. The address listed K.Y. was 503 Marshall Drive, Shillington, PA 19607 and is not the true address for K.Y., who resides in the state of New York. A Mark Vega was added to the account as an authorized user which resulted in the issuance of American Express Card Number xxxxxxxxx71014 which was mailed to 503 Marshall Drive Shillington, PA 19607.
- f. On 07/05/16, an electronic application for credit was submitted via the internet to American Express utilizing the name, date of birth and social security number of K.Y. The application was approved and resulted in the issuance of American Express Card Number xxxxxxxxx21007. The address listed K.Y. was 503 Marshall Drive, Shillington, PA 19607 and is not the true address for K.Y., who resides in the state of New York. A Mark Vega was added to the account as an authorized user which resulted in the issuance of American Express Card Number xxxxxxxxx21015 which was mailed to 503 Marshall Drive Shillington, PA 19607.
- g. On 07/11/16, an electronic application for credit was submitted via the internet to American Express utilizing the name, date of birth and social

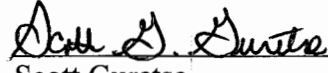
security number of X. W. The application was approved and resulted in the issuance of American Express Card Number xxxxxxxx01006. The address listed X.W. was 503 Marshall Drive, Shillington, PA 19607 and is not the true address for X.W., who resides in the state of New York. A Mark Vega was added to the account as an authorized user which resulted in the issuance of American Express Card Number xxxxxxxx01014 which was mailed to 503 Marshall Drive Shillington, PA 19607.

- h. On 07/06/16, an electronic application for credit was submitted via the internet to American Express utilizing the name, date of birth and social security number of A.S. The application was approved and resulted in the issuance of American Express Card Number xxxxxxxx81006. The address listed A.S. was 503 Marshall Drive, Shillington, PA 19607 and is not the true address for A.S., who resides in the state of New York. A Mark Vega was added to the account as an authorized user which resulted in the issuance of American Express Card Number xxxxxxxx81014 which was mailed to 503 Marshall Drive Shillington, PA 19607.

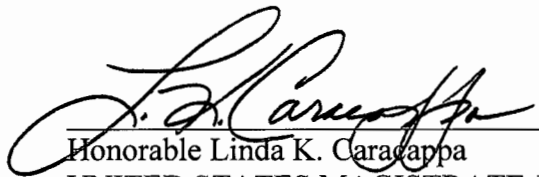
14. On August 17, 2016, Detective Lis along with other municipal, state and federal law enforcement officers executed a search warrant at 503 Marshall Drive, Cumru Township, Berks County, PA. Officers found Mark Vega sleeping in an upstairs bedroom. Mark Vega was read his Miranda rights and admitted to acquiring credit cards using stolen identities. Mark Vega turned over one fraudulent credit card and computer used to create the accounts. Mark Vega was arrested by Cumru Township Police.

15. The search of Mark Vega's residence resulted in the seizure of a voluminous amount of identity information belonging to others including, but not limited to, victims already listed above. The information found included credit cards, bank cards, checks, statements and other records and documents associated with financial account information and other types of accounts and sources of information.

16. Based on the foregoing, I have probable cause to believe that Mark Vega has violated Title 18, United States Code, Section 1341, mail fraud, Title 18, United States Code, Section 1028A, aggravated identity theft.

  
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Scott Guretske  
United States Postal Inspector

Subscribed and sworn to before me  
this 14 of September, 2016

  
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Honorable Linda K. Caragappa  
UNITED STATES MAGISTRATE JUDGE